

March 20, 2013

***VIA ELECTRONIC FILING***

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street SW.  
Washington, DC 20554

56825 Venture Lane

Suite 110

Sunriver, OR 97707

Ph 541.593.2900

Fx 541.593.2090

[www.atlc.com](http://www.atlc.com)

**Re: In the Matter of the Request for Comments on Petition of SMS/800, Inc. to assume the role of toll free database neutral administrator and assume tariffing responsibilities in WCB Docket No. 12-260**

Dear Secretary Dortch:

ATL Communications (Commenter) supports the Petition to expand the membership and governance of SMS/800, Inc. (Petitioner) in order to increase industry participation in the oversight of the SMS/800 system and also supports the requests to transfer tariffing responsibility for SMS/800 services to Petitioner and for Petitioner to assume the role of neutral administrator.

Commenter supports Petitioner's proposals to expand its existing membership and management. Today, many industry participants, and not just the three BOCs, are affected by the operation and management of SMS/800 services, and these participants should have an opportunity to contribute to and be represented in such operation and management. Petitioner's proposed expansion will provide all industry participants concerned with the operation and management of SMS/800 services with an opportunity to become involved. Such expansion will result in input from diverse affected parties, so that Petitioner can better serve the industry. Moreover, Petitioner has already obtained broad industry support for its reorganization by working with a Transition Committee made up of industry representatives to develop the proposal.

**I. Transfer of Tariff Responsibility to Petitioner**

Commenter agrees with Petitioner that the Commission has the legal authority to transfer tariffing responsibility for SMS/800 services from the BOCs to Petitioner. In addition, a transfer of the tariffing responsibility to Petitioner upon approval of the Petition will allow the provision of SMS/800 services to be administered more efficiently.

## **II. Assumption of Neutral Administrator Role by Petitioner**

As part of the tariff transfer, Petitioner requests it serve as the neutral administrator of SMS/800 services. Commenter supports after completion of the proposed expansion of its membership and board positions SMS/800 will meet the regulatory criteria for neutrality.

## **III. Conclusion**

For these reasons Commenter supports the Petition of SMS/800, Inc. to expand its membership and governance to the entire industry, to transfer the SMS/800 service tariffing responsibility, and to assume the role of neutral administrator of SMS/800 services.